

United States Department of the Interior

BUREAU OF LAND MANAGEMENT

Montana State Office

5001 Southgate Drive, P.O. Box 36800

Billings, Montana 59107-6800

<http://www.mt.blm.gov/>

In Reply To:

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Instruction Memorandum No. MT-2004-045

Expires: 9/30/05

To: State Management Team

From: State Director

Subject: Montana/Dakotas Safety and Occupational Health Plan

The purpose of this instruction memorandum is to reissue the Safety and Occupational Health (S&H) Plan, based on the Bureau's six guiding elements for the Safety Program. It is designed to promote safety consciousness among all managers, supervisors, and employees in an effort to identify and eliminate unsafe working conditions and practices. It also provides policy direction so we may target specific goals at the State and Field Office levels.

I am requesting each office to review and evaluate their current Safety emphasis and to develop a strategy to ensure that Safety is planned as an integral part of all your activities. This information is designed to assist you in developing the Safety strategies necessary for your programs and facilities. The State Safety Specialists and your facility collateral duty safety officer are available to provide assistance, recommendations, and/or site visits to assist in the development and implementation of your Safety program.

If you have questions, you may contact Karilynn Volk, at 406-896-5190, or Lisa Engelmann, at 406-896-5193.

Signed by: Martin C. Ott

Authenticated by: Aleta Zahorodny (MT-930)

1 Attachment

1-MT/DAKs Safety and Occupational Health Plan (10 pp)

Distribution w/attms.

Assistant Field Manager, Glasgow Field Station

Assistant Field Manager, Havre Field Station

AOs

(WO-740), Bruce Prater, MIB, Room 2044

BUREAU OF LAND MANAGEMENT MONTANA/DAKOTAS

SAFETY AND OCCUPATIONAL HEALTH PLAN



FY 2004

**Bureau of Land Management
Montana/Dakotas
Safety and Occupational Health Plan**

Prepared

by: Karilynn K. Volk
State Safety Specialist

Date: 3-16-2004

Reviewed

by: Sandra L. Guches
Deputy State Director, Division of Support Services

Date: 3-16-04

Approved

by: Martin C. Ott
State Director

Date: 03/17/04

Bureau of Land Management
Montana/Dakotas
Safety and Occupational Health Plan

I. Introduction to the Program. State and federal laws, as well as Bureau of Land Management (BLM) policy, make the safety and health of our employees the first consideration in conducting our day-to-day business. Safety and health must be a part of our every day operation, and every employee's responsibility.

II. Program Goal. The program goal is to establish and implement a S&H program in the Montana/Dakotas BLM that will promote safety consciousness among all managers, supervisors, and employees in an effort to identify and eliminate unsafe working conditions and practices.

III. Policy Statement. The management of Montana/Dakotas BLM is committed to providing employees and visitors with a safe and healthy environment. In order to do this, each of us must make safety a core value that is inherent in everything we do; it can never be deleted for convenience or expediency. It is, therefore, a basic requirement that each supervisor makes safety an integral part of his/her regular management functions. It is equally the duty of each employee to accept and follow established safety policies and procedures.

A copy of the current State Director's Safety and Health Policy was issued as [Instruction Memorandum No. MT-2004-002.](#)

IV. Authority.

A. Public Law 91-596, Occupational Safety and Health Act of 1970, Section 19, "Federal Agency Safety Programs and Responsibilities."

B. Executive Order 12196, "Occupational Safety and Health Programs for Federal Employees."

C. Code of Federal Regulations, Title 29, Occupational Safety and Health Administration (OSHA): Part 1910, "Occupational Safety and Health Standards;" Part 1925, "Safety and Health for Federal Service Contracts;" Part 1926, "Safety and Health Regulations for Construction;" and Part 1960, "Basic Program Elements for Federal Employee Occupational Safety and Health Programs and Related Matters."

D. Department Manual, Part 485, "Safety and Health Programs."

E. Bureau of Land Management (BLM) Manual and Handbooks: 1112, "Safety;" H-1112-1, "Safety and Health Management;" and H-1112-2, "Safety and Health for Field Operations."

V. Responsibilities.

A. The State Director, Associate State Director, Deputy State Directors, Field Office/Station Managers are charged with the responsibility to implement a safety and occupational health program within their respective areas of responsibility.

B. Supervisors are responsible for providing their employees with a safe and healthful environment in performing their assigned tasks, ensuring that their employees follow safe work practices and procedures, provide safety training as needed, and make safety an integral part of their daily operation.

C. State Safety and Health Specialists are responsible for administering the BLM S&H program in the states of Montana, North Dakota, and South Dakota. This includes providing advice and recommendations to the State Director and State Management Team on all matters pertaining to safety and health.

D. Field Collateral Duty Safety Officers (CDSO) and Safety Committees represent the Field Managers in the S&H program located within that Field Office/Station jurisdiction. Collateral Duty Safety Officers should be allowed up to 20 percent of their time to work on S&H program requirements located at their facility. Individuals appointed as CDSOs shall have their position descriptions (PD) amended to include their S&H program responsibilities. A sample PD amendment is provided as Appendix 1.

E. Employees and volunteers will adhere to safety rules, practices, and procedures in conducting their assigned tasks; report unsafe and unhealthful working conditions to their supervisors, managers, or CDSO; report immediately job-related accidents/incidents to their supervisor; maintain a high degree of safety awareness.

VI. Program Objectives. The objectives of the Montana/Dakotas Safety Program are to:

A. Prevent loss of life and harm to people and minimize damage to property, operations, or the equipment, by implementing a program of training, incentives, hazard identification and abatement, accident prevention and investigation, and management controls and evaluation.

B. Increase the efficiency of BLM operations and reduce workers' compensation, property replacement, and tort claim costs through effective management and safe behavior, work practices, and procedures.

C. Provide a program evaluation process to determine the effectiveness of safety and health management within the Montana/Dakotas BLM.

VII. Essential Safety and Health Program Elements. The Safety Program is developed, implemented, and evaluated pursuant to the following essential elements. Managers should ensure that these elements are integrated in safety and health programs and action plans: Program Management Tools, Training, Inspections, Safety and Health Promotions, Accident Investigation and Reporting, Program Evaluation.

A. Program Management Tools

1. Regulations, policy, and guidance: Primary references which govern this S&H Plan are listed under section IV. Policy guidance is also provided through Instruction Memoranda and Instruction Bulletins for special compliance areas; i.e., bloodborne pathogens, hazard communication, hearing conservation program, personal protective equipment, respiratory protection program, etc. Presidential Executive Order SHARE: Safety, Health, and Return-to-Employment Initiative for fiscal years 2004-2006 is established as a primary goal for injury reduction rates.

2. Top Management Commitment to Safety and Health. A State Safety policy will be issued to all employees which clearly defines management's commitment to employee safety. It is recommended that each Field Manager review the requirements imposed by their mission and location, and issue a Field Office Safety policy for their area of responsibility.

3. Plans and Reports. All mandated OSHA and other relevant program plans will be reviewed annually and updated as necessary by State Safety Specialists or field CDSOs.

a) All recordable accidents must be entered into the Safety Management Information System (SMIS) within 7 working days following the date management becomes aware of the accident. This ensures that the accident is recorded on the required OSHA Log or Summary.

b) At the end of each calendar year, the OSHA 300 log must be reviewed to verify that the entries are complete and accurate, create an annual summary of injuries and illnesses recorded on the OSHA 300 log, certify the summary, and post the annual summary. The OSHA summary of recordable accidents must be posted from February to April.

c) Annual Accomplishment Report. An end-of-year report on the accomplishments towards achieving the goals and objectives in the annual Safety Action Plan, a review of accident statistics and trends for the previous year, and other significant accomplishments or changes in the S&H Program will be provided to the State Management Team for review.

d) Each office will develop an annual Safety and Health Action Plan to outline courses of action to improve their Safety Program. Plans will be based on Bureau Manual/Handbook 1112 requirements, national Safety Office and State Director priorities and local needs identified by each office.

4. Abatement of Unsafe and Unhealthy Conditions. Employees are expected to report any unsafe or unhealthy condition in their work environment to their supervisor, the State Safety Specialists or their local field CDSO. Formal reports may be made using [Form 1112-4, "Employee Report of Unsafe or Unhealthful Working Condition."](#) Any unsafe condition noted in a safety inspection will be accompanied by a recommendation. The local Field Office/Station will complete a [Form 1112-8, "Hazard Abatement Plan"](#) when a finding cannot be corrected within 30 days.

5. Integration of Risk Management. Risk Management will be the primary hazard reduction tool for BLM Montana/Dakotas. [Form 1112-5, "Risk Management Worksheet"](#) provides a tool for identifying hazards, assessing risk, developing and implementing control measures, enforcing use of selected controls and evaluating their effectiveness.

6. Program Resources. Management will provide a budget for the necessary staff, funding, materials, supplies and equipment at all organizational levels to effectively administer the activities of the Montana/Dakotas S&H Program. Managers will ensure that mandatory requirements of the S&H Program are met, known safety hazards are being addressed, and abatement procedures are in place.

7. Safety and Health Committees. The State Safety Management Committee will meet four times a year, as established by charter, to address employee safety issues and concerns as well as communicate new initiatives to the members. The Chairman of the State Safety Management Committee will brief the State Management Team on the Committee's activities.

The State Office and each Field Office will have an effective Safety Committee that addresses site-specific issues; reviews accident reports, corrective action and trends; and actively supports the integration of Safety into all program areas.

B. Training

1. Orientation for all new and transferred employees: Appropriate safety training will be provided before new employees, volunteers and employees with changed/additional assignments perform their duties. The responsibility for obtaining this training rests with the immediate supervisor. An [Employee Safety Orientation Checklist](#) is available at the BLM National Training Center website. It will assist supervisors in providing Safety orientation to new employees and volunteers. Scroll through the main menu at this National Training Center website and select topic 15 for Safety and Occupational Health.

2. Safety and health training for supervisors: All supervisors will be trained in their OSHA mandated responsibilities for providing and maintaining the safe and healthful working conditions for their employees and volunteers.

3. Integration of safety considerations in all training: Managers and supervisors are encouraged to integrate safety and health issues as a standard component for all training. All training programs will include job and site specific safety hazards.

4. Specialized training requirements. Training will be provided for all employees on specific OSHA requirements that pertain to their workplace and their job assignments. Personal protective equipment (PPE) requirements that were identified in a Risk or Hazard Assessment will be reviewed by supervisors and employees together with appropriate training provided and documented.

Many Bureau activities require specialized training and/or authorizations. This training includes, but is not limited to:

- a) Watercraft operator certification
- b) All-terrain vehicle (ATV) operator certification
- c) Snowmobile operator certification
- d) All motorized heavy equipment
- e) Non-law enforcement firearms training

5. Core competency training for full-time and part-time S&H staff: Core competencies have been established to provide the foundation required for all Safety personnel to competently perform their duties. Managers and supervisors will support Safety personnel in receiving this training which will allow them to obtain the expertise to function effectively within our organization.

C. Inspections

1. Annual Inspections: At least annually, a State Safety Specialist/Manager will conduct a thorough safety inspection of all facilities, warehouses, and ware yards. This includes primary , high-use recreation sites. Field Managers are responsible to ensure that remote Field Stations, recreation sites, campgrounds, by-ways, and quarters are inspected to ensure an environment that is safe and free of recognized hazards that would endanger the safety, health, and well-being of BLM employees, volunteers, and visiting public.

A written inspection report, recommendations for remediation of identified hazards, and an abatement plan and schedule will be provided to the responsible manager. Follow-up inspections may be necessary to provide field assistance or to ensure that hazard abatement plans have been completed and interim remediation is sufficient to protect employees and the public. Follow-up inspections may be completed by the State Safety Specialist/Manager or a Field Office Collateral Duty Safety Officer.

2. Periodic Inspections: Supervisors, employees, and Safety personnel will conduct periodic safety inspections of their work areas. Recommendations will be made for the abatement of any unsafe or unhealthful condition.

3. Assistance Visits: The Montana/Dakotas Safety Program may provide assistance visits within the tri-state area for additional support in the administration of the Safety Program as required, or to address specific issues which may warrant expertise and guidance from the National Office.

4. CASHE Audits: Compliance Assessments - Safety, Health and the Environment will be scheduled based on the risk associated with the State or Field Office. Offices in Montana/Dakotas may expect a CASHE audit every 4-5 years.

D. Safety and Health Promotion

1. Safety and Health promotion at all levels: Management is to encourage and promote Safety initiatives within their respective offices by attitude, examples, and direction. Employee involvement is the key to the success of the S&H Program. Management will encourage the participation of employees on safety groups or activities that are organized to address safety issues, and dedicated to the improvement of our working environment.

2. Recognition and awards for Safety performance: Safety recognition will be given to individuals making significant contributions to employee safety. At Field Manager discretion, Field Offices may initiate their own Safety awards program to recognize safety achievements by individuals or groups.

3. The Safety page on the Montana/Dakotas intranet site is an important tool used to manage safety and health information. The website is populated with current and pertinent safety information for Safety personnel as well as employees and supervisors.

4. Each year the Department of the Interior encourages Bureaus to conduct safety, security and/or wellness-related activities during the first week of April. The planning and conducting of observances, activities and events is left to individual field sites to do what is most effective for them.

E. Accident Investigation and Reporting

1. Accident Investigations: Supervisors are responsible to initiate an investigation of all accidents/incidents either personally or through a designated investigator. Assistance in investigations can be obtained through the State Safety Specialists. Supervisors shall ensure that all accidents are thoroughly investigated and accident reports are submitted timely.

All serious accidents will be investigated according to the protocols outlined in the Bureau Manual Handbook H-1112-1. A serious accident is defined as an employee fatality or the hospitalization of three or more employees.

2. Accident/Incident Reports: A sound accident prevention program includes proper accident/incident investigation, reporting, and follow-up to prevent recurrence. The data obtained in a thorough accident investigation provides management with the necessary information to identify unsafe practices and procedures and to establish abatement priorities. All investigations have as a goal the identification of the root cause of the accident, rather than assigning blame. All accidents or near misses will be investigated and reported.

3. Safety Management Information System (SMIS): All accidents will be recorded into the Safety Management Information System by the supervisor. This information will be reviewed for accuracy by the field CDSO and/or the State Safety Specialists. Every report submitted through SMIS will be automatically forwarded to the State Safety Manager to be reviewed and posted to the Department of Interior permanent accident database.

To support a personal injury claim or illness, the following supplementary forms are also required: CA-1, "Federal Employee's Notice of Traumatic Injury and Claim for Continuation of Pay/Compensation;" CA-2, "Notice of Occupational Disease and Claim for Compensation;" CA-16, "Authorization for Examination and/or Treatment."

The following supplementary forms and information are required for property damage motor vehicle accidents: SF-91, "Motor Vehicle Accident Report;" SF-94, "Witness Statement;" state and/or local reports from Police, Sheriff or Highway Patrol; one estimate for repair of damage if less than \$2500 (three estimates are needed if damage is over \$2500); license number/identification for the vehicle(s) or property involved.

4. Statistical analysis of accidents: State/Field Safety personnel will provide statistical analysis of accidents to managers upon request. The State Safety Manager will at a minimum prepare an end-of-year statistical analysis for the State Management Team review as well as a presentation to the State Safety Management Committee.

F. Program Evaluation:

1. Performance metrics (measurements): The Safety Program will be evaluated on the Field Office implementation of required OSHA standards. Additionally, the measure of accomplishments will consider the goals outlined in the Montana/Dakotas Safety and Health Action Plan.

2. Internal Safety Program Evaluations: The State Safety Specialists will conduct full Safety program evaluations of three Field Offices annually. These will normally be scheduled concurrently with the facility inspection.
3. Every 3 years the Bureau Safety Manager will validate that Field Offices are implementing OSHA standards in 29 CFR 1910, 1926, and 1960. The national Safety Office will issue a checklist prior to the evaluation to identify the scope of the review.

Position Description Amendment
For
Collateral Duty Safety Officers

Incumbent is assigned as collateral duty safety and occupational health coordinator in the _____ Field Office/Station. Allotted time is ____ (10-20 %) of his/her time.

Major Duties: Monitors compliance with safety and health regulations and is the point of contact for all safety and health issues/concerns in the Field Office/Station. Inspects field sites, recreation sites, etc. and coordinates the inspection of Field Office/Station offices, warehouses and ware yards with the State Office. Investigates or assists with the investigation of any employee or visitor accident and those accidents involving property damage to BLM facilities or equipment. Assists supervisors complete accident reports. Conducts or arranges for appropriate safety and health training.

Informs Field Manager and State S&H Manager of all actions and issues related to Safety and Health. Ensures records are kept in accordance with 29 CFR 1960. Reports Safety Action Plan accomplishments to the State S&H Manager annually. Keeps the Field Office Safety Plans current.

Competencies required for successful performance as a Field Office Collateral Duty Safety Officer include: Accident Investigation; Briefing Techniques; OSHA 600, Collateral Duty Course for Other Federal Agencies; Inspection Techniques; and Principles of Safety and Occupational Health. All Field Office CDSOs are expected to complete the OSHA 600 course within 6 months of their appointment.